

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

BARRY WEINSTEIN

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DOCKET NO. 3:24-CR-00049-S

UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Barry Weinstein, and respectfully submits this Unopposed Motion to Travel and in support thereof, would show the Court as follows:

Prior to the return of the Indictment against him on February 21, 2024, the Defendant had arranged for he and his wife to go on three upcoming vacations outside the continental United States. Specifically, the dates and destinations of the Defendant's currently scheduled travel are as follows:

Trip Description	Departure Date	Return Date	International Destination(s)
Caribbean Cruise Reservation No. xxxx644	04-28-2024	05-05-2024	Roatan, Honduras Costa Maya, Mexico Cozumel, Mexico
Western Caribbean Cruise Itinerary Code xxx576	10-20-2024	10-27-2024	Roatan, Honduras Puerto Costa Maya, Mexico Cozumel, Mexico
Eastern Caribbean Cruise Reservation No. xxxx534	01-11-2025	01-19-2025	Basseterre, St. Kitts & Nevis Philipsburg, St. Maarten Charlotte Amalie, St. Thomas Perfect Day Cococay, Bahamas

In order to allow him to attend these previously scheduled vacations with his wife and avoid the possibility of losing any deposits or fees paid in advance, the Defendant respectfully requests that the Court grant him leave to travel outside the continental United States within the specific confines of the three trips described above.

Furthermore, in order to facilitate such travel, the Defendant respectfully requests that he be permitted to retrieve his passport from the United States District Clerk for the Northern District of Texas up to five (5) business days in advance of each departure date and subsequently surrender it back to the United States District Clerk for the Northern District of Texas no later than five (5) business days after each return date, as set forth below:

	Departure Date	Return Date	Passport Retrieval and Surrender Dates
Trip No. 1	04-28-2024	05-05-2024	Retrieve passport on or after 04-22-2024. Surrender passport on or before 05-10-2024.
Trip No. 2	10-20-2024	10-27-2024	Retrieve passport on or after 10-14-2024. Surrender passport on or before 11-01-2024.
Trip No. 3	01-11-2025	01-19-2025	Retrieve passport on or after 01-06-2025. Surrender passport on or before 01-24-2025.

Particularly considering that the Defendant lives in Houston, TX (where he has resided for nearly thirty years), a window of five (5) business days before and after the departure and return dates of the trips in question will provide the Defendant with a sufficient, but not greater than necessary, period of time within which to facilitate the retrieval and re-surrender of his passport from the United States District Clerk for the Northern District of Texas in connection with each trip.

As reflected within the Defendant's Pretrial Bond Report, there are no factors beyond the fact of the indictment, itself, which indicate that the Defendant poses any risk of flight or non-appearance. Likewise, the trips at issue are consistent with the Defendant's ordinary and established vacation habits. Furthermore, requiring the re-surrender of the Defendant's passport upon return from each of these pre-arranged trips will facilitate his ability to attend these pre-approved vacations, while nonetheless preventing any unauthorized international travel outside these three specific trips. Moreover, counsel for the Defendant has consulted with counsel for the Government regarding the relief requested herein and confirmed that the Government is unopposed to the same.

PRAYER FOR RELIEF

For each of the reasons set forth above, the Defendant respectfully requests that the instant Motion be, in all things, GRANTED, and that the Court issue an Order granting the Defendant leave to travel outside the continental United States on the three specific occasions specified herein and authorizing the release of the Defendant's passport no more than five (5) business days prior to the departure date of each trip, on condition that it subsequently be re-surrendered no later than five (5) business days after the return date of each trip, and for any other relief as to which the Defendant may be entitled.

Respectfully submitted,

/s/ Alexandra Hunt

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COUNSEL FOR DEFENDANT WEINSTEIN

CERTIFICATE OF CONFERENCE

I hereby certify that on the 28th day of February, 2024, counsel for the Defendant conferred with counsel for the Government, Mr. Chad Meachum, regarding the foregoing Motion and that he is unopposed to the same.

/s/ Alexandra Hunt
ALEXANDRA HUNT

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2024, a true and correct copy of the above and foregoing document was filed electronically with the Clerk of the U.S. District Court for the Northern District of Texas to be served upon all counsel of record by the Court's electronic filing system.

/s/ Alexandra Hunt
ALEXANDRA HUNT